

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X

CHRISTINE N. KNIGHT,
Plaintiff,

v.

METROPOLITAN TRANSPORTATION AUTHORITY -NEW YORK CITY TRANSIT
Defendant.

----- X

Case No.: 19-CV-1428 (PKC) (LB)

PRO SE NOTICE OF MOTION FOR RECONSIDERATION

Christine N. Knight
28 Pony Court
Smyrna, DE 19977
(917) 674-7300
4yomind@gmail.com

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Plaintiff's Motion for Reconsideration, Plaintiff Christine N. Knight, proceeding pro se, respectfully moves this Court, before the Honorable Pamela K. Chen, United States District Judge for the Eastern District of New York, at a date and time to be set by the Court, for reconsideration of its prior ruling granting summary judgment in favor of Defendant, pursuant to Federal Rules of Civil Procedure 60(b)(1) and 60(b)(6), and Local Rule 6.3.

Plaintiff respectfully submits that reconsideration is warranted for the following reasons:

1. The Court failed to address Plaintiff's retaliation claims under the New York City Human Rights Law ("NYCHRL") in its summary judgment order (ECF 116)- its section labeled "Retaliation" (pp 55-59) only evaluates retaliation claims under Title VII and NYSHRL, but does not analyze the NYCHRL retaliation claim under the appropriate standard.
2. The Court misapplied the **broad retaliation standard under the NYCHRL**, improperly requiring a material adversity standard rather than a "treated less well" standard.
3. The Court **did not properly weigh evidence** of retaliatory motive, pretext, and circumstantial evidence in light of the NYCHRL retaliation standard.
4. The Court **incorrectly dismissed temporal proximity** and failed to recognize the escalating pattern of retaliatory conduct.
5. The Court **erroneously analyzed** Plaintiff's constructive discharge claim without considering the cumulative impact of Defendant's retaliatory actions.

In support of this motion, Plaintiff submits the following:

- **Memorandum of Law in Support of Motion for Reconsideration**

- Plaintiff respectfully requests that the Court refer to the exhibits already on the court record under Docket Number 109 for the exhibits referenced in the accompanying memorandum.

WHEREFORE, for the foregoing reasons, Plaintiff respectfully requests that this Court:

1. Vacate or modify its prior ruling granting summary judgment in favor of Defendant;
2. Recognize that the NYCHRL retaliation claim was not properly analyzed in its summary judgment order and, as a result, should immediately survive and proceed to trial.
3. Reopen the case for further proceedings on Plaintiff's retaliation claims under the NYCHRL;
4. Alternatively, should the Court decline to proceed with a federal trial on the NYCHRL retaliation claim, Plaintiff respectfully requests that the Court exercise its discretion under 28 U.S.C. § 1337(c) to decline supplemental jurisdiction over the NYCHRL claim and dismiss it without prejudice, allowing Plaintiff to re-file this claim in New York State Supreme Court; and
5. Grant such other and further relief as this Court deems just and proper.

Dated: February 10, 2025

New York, New York

Respectfully submitted,

By: /s/ Christine N. Knight

Christine N. Knight
28 Pony Court
Smyrna, DE 19977
(917) 674-7300
4yomind@gmail.com